

EXHIBIT B

Declaration of Nick Millington

I, Nick Millington, hereby declare as follows:

1. I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently and truthfully under oath regarding the facts set forth in this declaration.
2. I am an employee of Sonos, Inc. (“Sonos”) and I currently serve as Sonos’s Chief Innovation Officer. I am based in Santa Barbara, California.
3. I began working at Sonos (which was originally called Rincon Networks) in April 2003, and I was a Director of Software Development at Sonos from June 2003 to October 2006.
4. I was a founding member of the product team at Sonos, and I worked with other developers and engineers (including Rob Lambourne) to build the initial version of Sonos’s networked multi-zone audio system, which was launched commercially in January 2005 under the name “The Sonos Digital Music System.” The initial version of Sonos’s networked multi-zone audio system was comprised of networked audio playback devices that Sonos referred to as “Sonos ZonePlayers” (model number ZP100) and networked controller devices that Sonos referred to as “Sonos Controllers” (model number CR100), along with “Desktop Controller” software for Windows computers.
5. The initial version of Sonos’s networked multi-zone audio system included technology for grouping Sonos ZonePlayers together for synchronous playback in an ad-hoc manner, which Sonos referred to as “ad-hoc” or “dynamic” grouping. With that ad-hoc grouping technology, a user that wished to listen to audio in synchrony on a group of Sonos ZonePlayers could use a Sonos Controller (or a computer running the Desktop Controller software) to select the particular ZonePlayers to group together in an ad-hoc manner, one-by-one, in order to create an ad-hoc group of ZonePlayers, which was immediately invoked for synchronous playback and would temporarily remain in existence until such time that the user wished to use the ZonePlayers for individual playback (or for grouped playback as part of a different group) and the group was destroyed. Sonos referred to such a temporary, ad-hoc group as a “zone group.”

6. As part of this ad-hoc grouping technology, Sonos's controller interface also included an "All Zones-Party Mode" option, which was hard-coded into Sonos Controllers (and the Desktop Controller software) and allowed a user to create an-hoc "zone group" comprising all of the ZonePlayers in the user's system with a single touch rather than requiring the user to select each of the ZonePlayers one at a time.

7. This ad-hoc grouping technology is described in the April 2005 User Guide for the Sonos Digital Music System (SONOS-SVG2-00227441 - SONOS-SVG2-00227554):

Zone groups

Two or more zones can be grouped together to form a zone group, which allows you to play the same music across zones. You can also link all the ZonePlayers in your house with one touch by selecting **All Zones-Party Mode**. You can add and drop zones from a zone group while your music is playing.

To add a zone to a zone group

1. Touch the **Zones** button on your Controller.

Select zone where desired music is playing

Select zone to add to group



2. Highlight the zone or zone group you want to add a zone to, and touch **Link Zone**.

Note: The order in which you add a zone makes a difference. If you select **Link Zone** from a zone where there is no music playing, any zone you link to it will also be silent.

3. Highlight the zone you want to add to the group, and touch **OK**. If you want to join all the zones in your house to this music queue, select **All Zones-Party Mode**. All of your ZonePlayers will then play the same music until you drop the zones from the zone group.



Kitchen and Garden make up a zone group

The music queue from the added zone is automatically replaced by the music queue from the zone or zone group it was linked to so that both zones play the same music

8. I recall that, at some point in 2005, Rob Lambourne began designing and developing new technology for grouping ZonePlayers together for synchronous playback that would enable a user to customize and pre-save predefined groupings of ZonePlayers that could later be invoked on demand for synchronous playback, which was not possible with Sonos's networked multi-zone audio system at the time. Indeed, the Sonos "zone groups" that could be created by users at the time were temporary, ad-hoc groups that could not be pre-saved for later invocation, and the hard-coded "All Zones-Party Mode" option did not provide users with any ability to customize and pre-save their own predefined groups of ZonePlayers. At some point Mr. Lambourne began referring to this technology as the "zone scene" feature.

9. In connection with his work, Mr. Lambourne drafted a "Sonos UI Specification" for "Zone Scenes" in December 2005, which provided a more detailed description of the "zone scene" technology that he had designed and developed up until that date. *See* SONOS-SVG2-00026839 - SONOS-SVG2-00026858. As explained in Mr. Lambourne's Sonos UI Specification, the "zone scene" technology he had designed and developed was a new feature that was intended to provide certain advantages over the current ad-hoc grouping technology of Sonos's networked multi-zone audio system at the time. In particular, the "Introduction" section of Mr. Lambourne's Sonos UI Specification explained that the "zone scene" technology would allow a user to avoid the need to "manually link[] zones one at a time until the desired zone grouping is reached" each time a "zone group" was created as was required in Sonos's current system at the time, and would also be "more flexible and powerful" than the hard-coded "All Zones-Party Mode" option that was available in Sonos's current system at the time:

1 Introduction

The Zone Scene feature allows the user to arrange the zones into groups using one single command. This is similar to the current Party Mode setting that is available. However, the Zone Scene feature is much more flexible and powerful.

Currently in the Sonos UI, zone groups are created by manually linking zones one at a time until the desired zone grouping is reached.

For Example

Start with **Living Room**

- Link the Kitchen to the Living Room to make a group of **(Living Room + Kitchen)**
- Then link the Den to the **(Living Room + Kitchen)** to make a group of **(Living Room + Kitchen + Den)**

The Zone Scene feature would allow the user to create a group of **(Living Room + Kitchen + Den)** with one command.

SONOS-SVG2-00026839 - SONOS-SVG2-00026858.

10. As confirmed by the April 2005 Sonos User Guide and Mr. Lambourne's Sonos UI Specification (among other documents), Sonos's networked multi-zone audio system at the time did not have any "zone scene" technology that would enable a user to customize and pre-save a predefined grouping of ZonePlayers that could later be invoked on demand for synchronous playback. This is consistent with my own recollection that Sonos's networked multi-zone audio system at the time did not have any "zone scene" technology.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 20th day of February, 2023, in
Santa Barbara, California



Nick Millington